

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: Mary Junita Jones, Debtor

**Case No. 24-00337-JAW
CHAPTER 13**

NOTICE

The above referenced debtor has filed papers with the court to allow payment arrearage.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to amortize the payments, or if you want the court to consider your views on the Motion, then on or before 30 days, you or your attorney must:

File with the court a written request for a hearing at:

U.S. Bankruptcy Clerk
U.S. Bankruptcy Court
Thad Cochran United States Courthouse
501 E. Court St., Ste 2.300
Jackson, MS 39201

If you mail your request to the court for filing, you must mail it early enough so the court will **receive** it on or before the date state above.

You must also mail a copy to the debtors' attorney:

The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
(601) 500-5533

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief, which shall sustain this Motion to Allow Payment Arrearage.

Date: July 7, 2025

Signature: /s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MSBN 103469)
Jennifer Ann Curry Calvillo (MSBN 104367)
The Rollins Law Firm, PLLC
P.O Box 13767
Jackson, MS 39236

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: Mary Junita Jones, Debtor

**Case No. 24-00337-JAW
CHAPTER 13**

MOTION TO ALLOW PAYMENT ARREARAGE

COMES NOW, Debtor, by and through counsel, and moves this Court to amortize their past due Chapter 13 plan payments, and in support thereof, would show the Court as follows:

1. Debtor filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code.
2. Debtor fell behind on her payments.
3. Debtor is requesting this Honorable Court to amortize the past due plan payments over the life of the plan, including any ongoing mortgage payments being paid through the plan.
4. Debtor is requesting that their Chapter 13 plan payments be increased as necessary to compensate for the lost plan payments with ongoing payments to resume in August 2025.

WHEREFORE, Debtor prays for an Order granting the above requested relief and any additional relief as may be just and proper.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MS Bar No. 103469)
Jennifer Ann Curry Calvillo (MS Bar No. 104367)
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
601-500-5533

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Notice and Motion to Allow Payment Arrearage was forwarded on July 7, 2025, to:

By Electronic CM/ECF Notice:

Chapter 13 Case Trustee

U.S. Trustee

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:
MARY JUNITA JONES

CASE NO: 24-00337-JAW

**DECLARATION OF MAILING
CERTIFICATE OF SERVICE**

Chapter: 13

On 7/7/2025, I did cause a copy of the following documents, described below,

Notice and Motion to Allow Payment Arrearage

to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a [certIFICATEofservice.com](#), an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 7/7/2025

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.
Attorney at Law
The Rollins Law Firm
702 W. Pine Street
Hattiesburg, MS 39401
601 500 5533
trollins@therollinsfirm.com

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3 **UNITED STATES BANKRUPTCY COURT**
4 **SOUTHERN DISTRICT OF MISSISSIPPI**
56 **IN RE:**
7 **MARY JUNITA JONES**
86 **CASE NO: 24-00337-JAW**
7 **CERTIFICATE OF SERVICE**
8 **DECLARATION OF MAILING**
910 Chapter: 13
1112 On 7/7/2025, a copy of the following documents, described below,
13 Notice and Motion to Allow Payment Arrearage
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17
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19 were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient
20 postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth
herein.21 The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above
22 referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of
Service and that it is true and correct to the best of my knowledge, information, and belief.23 DATED: 7/7/2025
2425 
2627 Miles Wood
28 BK Attorney Services, LLC
d/b/a certificateofservice.com, for
Thomas C. Rollins, Jr.
The Rollins Law Firm
702 W. Pine Street
Hattiesburg, MS 39401

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

CASE INFO

LABEL MATRIX FOR LOCAL NOTICING
 NCRS ADDRESS DOWNLOAD
 CASE 24-00337-JAW
 SOUTHERN DISTRICT OF MISSISSIPPI
 MON JUL 7 8-40-9 PST 2025

(P) 21ST MORTGAGE CORPORATION
 PO BOX 477
 KNOXVILLE TN 37901-0477

EXCLUDE

(U) EARTH AUTO CREDIT LLC DBA CNAC

EXCLUDE

US BANKRUPTCY COURT
 THAD COCHRAN US COURTHOUSE
 501 E COURT STREET
 SUITE 2300
 JACKSON MS 39201-5036

EXCLUDE

(D) (P) 21ST MORTGAGE CORPORATION
 PO BOX 477
 KNOXVILLE TN 37901-0477

EXCLUDE

(D) (P) 21ST MORTGAGE CORPORATION
 PO BOX 477
 KNOXVILLE TN 37901-0477

AARONS
 1556 SIMPSON HWY 49
 MAGEE MS 39111

ADVANCE AMERICA
 1323 W GOVERNMENT ST
 STE D
 BRANDON MS 39042-3084

(P) ALLIANT CAPITAL MANAGEMENT HDH
 ATTN CO WEINSTEIN RILEY P S
 1415 WESTERN AVE
 SUITE 700
 SEATTLE WA 98101-2051

BRANDON HMA LLC DBA MERIT HEALTH
 RANKIN
 CO DAVID L MENDELSON ESQ
 MENDELSON LAW FIRM
 PO BOX 17235
 MEMPHIS TN 38187-0235

CASHNET USA
 175 W JACKSON
 STE 1000
 CHICAGO IL 60604-2863

CNAC MS104
 2521 HWY 80 EAST
 PEARL MS 39208-3328

EARTH AUTO CREDIT LLC DBA CNAC
 CO SIMPSON LAW FIRM PA
 PO BOX 2058
 MADISON MS 39130-2058

FAMILY HEALTH CARE
 1551 W GOVERNMENT ST
 BRANDON MS 39042-2408

FIRST TOWER LOAN LLC
 PO BOX 320001
 FLOWOOD MS 39232-0001

JOHN S SIMPSON ESQ
 SIMPSON LAW FIRM PA
 FOR EARTH AUTO CREDIT LLC DBA CNAC
 PO BOX 2058
 MADISON MS 39130-2058

MS TITLE LOANS
 659 OLD HWY 49 S
 RICHLAND MS 39218-6033

MERIT HEALTH
 PO BOX 281441
 ATLANTA GA 30384-1441

MERIT HEALTH RANKIN
 CO PASI
 PO BOX 188
 BRENTWOOD TN 37024-0188

MISSISSIPPI FED CU
 P O BOX 55889
 JACKSON MS 39296-5889

MISSISSIPPI TITLE LOANS INC
 8601 DUNWOODY PLACE STE 406
 ATLANTA GA 30350-2550

REPUBLIC FINANCE
 1573 SIMPSON HWY 49 S
 STE 6
 MENDENHALL MS 39114

(P) REPUBLIC FINANCE LLC
 282 TOWER RD
 PONCHATOUA LA 70454-8318

SAPIENTES FUNDING II LLC
 CO WAKEFIELD ASSOCIATES LLC
 PO BOX 51272
 KNOXVILLE TN 37950-1272

SCOLOPAX LLC
 CO WEINSTEIN RILEY PS
 1415 WESTERN AVE SUITE 700
 SEATTLE WA 98101-2051

SIMPSON GENERAL HOSPITAL
 PO BOX 457
 MENDENHALL MS 39114-0457

SIMPSON GENERAL HOSPITAL
 1842 SIMPSON HWY 149
 MENDENHALL MS 39114-3438

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

SPEEDY CASH
3611 N RIDGE RD
WICHITA KS 67205-1214

(P) TOWER LOAN
P O BOX 320001
FLOWOOD MS 39232-0001

UNITED CREDIT CORP OF MAGEE
1586 SIMPSON HWY 49
MAGEE MS 39111-4401

UNITED CREDIT
1586 SIMPSON HWY 49
MAGEE MS 39111-4401

EXCLUDE
UNITED STATES TRUSTEE
501 EAST COURT STREET
SUITE 6 430
JACKSON MS 39201 5022

(P) WAKEFIELD ASSOCIATES
PO BOX 58
FORT MORGAN CO 80701-0058

ZAKARIA NEWSOME
112 ROSE HILL CIRCLE
MENDENHALL MS 39114-4434

DEBTOR
MARY JUNITA JONES
112 ROSE HILL CIRCLE
MENDENHALL MS 39114-4434

EXCLUDE
THOMAS CARL ROLLINS JR
THE ROLLINS LAW FIRM PLLC
PO BOX 13767
JACKSON MS 39236 3767

EXCLUDE

TORRI PARKER MARTIN
TORRI PARKER MARTIN CHAPTER 13
BANKRUPT
200 NORTH CONGRESS STREET STE 400
JACKSON MS 39201 1902